

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA

IN RE: ACTOS (PIOGLITAZONE) PRODUCT  
LIABILITY LITIGATION

6:11-MD-2299

Judge Doherty

Magistrate Judge Hanna

*This Document Relates To:  
All Cases*

**PLAINTIFFS' STEERING COMMITTEE'S  
MOTION TO COMPEL FED. R. CIV. P. 30(B)(6) DEPOSITION**

NOW INTO COURT, comes the Plaintiffs' Steering Committee, which moves the Honorable Court for an Order Compelling the Fed. R. Civ. P. 30(b)(6) deposition of Defendants, Takeda Pharmaceutical Company, Ltd., Takeda Pharmaceuticals U.S.A., Inc. (f/k/a Takeda Pharmaceuticals North America, Inc.), Takeda Pharmaceuticals America, Inc., Takeda Global Research & Development Center, Inc., Takeda California, Inc. (f/k/a Takeda San Diego, Inc.), Takeda Pharmaceuticals International, Inc., and Takeda Pharmaceuticals, LLC, on topics concerning destroyed custodial files and litigation holds for reasons set forth in the attached Memorandum.

Dated: June 18, 2013

Respectfully submitted,

/s/ Richard J. Arsenault

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Certificate Of Service

I hereby certify that on June 18, 2013, a copy of the above and Motion and Memorandum in Support of the Motion to Compel 30(b)(6) Deposition served on Defendants via e-mail and the Court's ECF system.

/s/ Richard J. Arsenault  
Richard J. Arsenault, Co-Lead Counsel